

EXHIBIT 36

CONFIDENTIAL

VIDEO DEPOSITION

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1, individually and on behalf
of all others similarly situated,

Plaintiff,

- vs - Case No.
22-cv-10019 (JSR)

JPMORGAN CHASE BANK, N.A.,

Defendant.

Video deposition of [REDACTED]
Plaintiff, taken pursuant to the Federal Rules of
Civil Procedure, at [REDACTED]
[REDACTED],
on March 3, 2023, commencing at 9:12 a.m., before
[REDACTED], Notary Public.

1

2 Q. Okay. Have you -- did you speak with
3 any of the other victims who were in court that day
4 before you addressed the court?

5 A. I mean, I would need a slice of time
6 that you're -- you have in mind because, you know,
7 I met them -- some of them through Jeffrey.

8 So if it was in 2000 -- you know, at
9 first -- or could you just rephrase the question?

10 Q. Sure. That morning -- the morning of
11 [REDACTED] --

12 A. Yeah.

13 Q. -- you were in the courtroom in [REDACTED]
14 [REDACTED], right?

15 A. Yes.

16 Q. Okay. Who else do you recall seeing
17 there that had been other victims of Jeffrey Epstein?

18 A. [REDACTED] was there, a girl named
19 [REDACTED], another victim, [REDACTED]. I
20 didn't realize it was her until she came up to me
21 after. I can't recall anyone else specifically,
22 but I -- I know that there were other women there.

23 Q. Okay.

24 A. If that's --

25 Q. And did [REDACTED] address the court

1 [REDACTED]
2 that day?

3 A. Yeah.

4 Q. Did [REDACTED] address the court that
5 day?

6 A. I don't remember if she did.

7 Q. Did [REDACTED] address the court that
8 day?

9 A. I don't remember.

10 Q. Okay. Do you agree with the statement
11 that you don't want to speak for all of the
12 victims?

13 A. Not anymore.

14 Q. What has caused you to change that
15 view?

16 A. I find it my -- my duty as a human
17 being who experienced very similar things, to help
18 them. Help people who may not want to speak for
19 themselves, who may want to be -- remain more
20 anonymous than I am.

21 For example, sitting here today, I -- it's
22 important to me to seek justice for them and for
23 myself [REDACTED].

24 Q. Have you spoken with [REDACTED] about
25 this lawsuit?

1

2 A. No.

3 Q. When is the last time you spoke with

4 [REDACTED]?

5 A. I believe it was the day before

6 yesterday, maybe two days ago.

7 Q. Does [REDACTED] know that you're

8 involved in this lawsuit?

9 A. I don't know.

10 Q. Have you ever told [REDACTED] that you
11 were involved in this lawsuit?

12 A. I don't remember if -- maybe. I don't
13 know.

14 Q. Do you think -- do you think you've
15 told [REDACTED] that you're involved in this
16 lawsuit?

17 A. Possibly.

18 Q. Have you told [REDACTED] that you're
19 involved in this lawsuit?

20 A. No.

21 Q. Have you told [REDACTED] that you're
22 involved in this lawsuit?

23 A. No.

24 Q. Have you told any of the other Epstein
25 victims that you are aware of, that you're involved

1 [REDACTED]

2 THE VIDEOGRAPHER: Okay. We are going back
3 on the record, time is 11:41.

4 BY MS. ELLSWORTH:

5 Q. Okay. So [REDACTED], I'm going to ask
6 you about your time with Mr. Epstein and we will
7 take breaks if you need them at any time.

8 So I want you to feel free to -- we can just
9 take a quick break and go off the record if we need
10 to at any point in time. Okay?

11 A. Okay.

12 MR. EDWARDS: And just so we're clear, the
13 questions you're going to be asking are not going
14 to be based on documents that were produced to you
15 yesterday that haven't yet been produced to us from
16 the production --

17 MS. ELLSWORTH: I'm asking --

18 MR. EDWARDS: -- from the estate?

19 MS. ELLSWORTH: I'm asking questions about
20 documents that [REDACTED] has produced.

21 MR. EDWARDS: Okay.

22 BY MS. ELLSWORTH:

23 Q. So I believe you provided information
24 to the estate -- excuse me, to the fund and to your
25 therapist that [REDACTED] is the individual who

1 [REDACTED]
2 introduced you to Mr. Epstein; is that correct?

3 A. Yes.

4 Q. Okay. How did you first meet
5 [REDACTED]?

6 A. We were both [REDACTED] studying at [REDACTED]
7 [REDACTED].

8 Q. Okay. And your complaint indicates
9 that you met Mr. Epstein via [REDACTED] in 2006?

10 A. Yeah.

11 Q. Okay. And what time of the year in
12 2006, do you know?

13 A. I remember it being when I was [REDACTED]
14 [REDACTED], which [REDACTED] usually -- generally
15 start in like September, October, so it had to have
16 been around then or towards -- a little bit later.

17 Q. Okay. And how did Mr. Epstein come up
18 in your conversation with [REDACTED]?

19 A. We weren't like generally friends
20 before that, she worked [REDACTED], I did
21 [REDACTED] at night there [REDACTED], but I
22 knew of her and exchanged conversations when I
23 bought something, I saw her [REDACTED]. We
24 exchanged very brief words.

25 She saw me at the grocery store adjacent to

1 [REDACTED]
2 [REDACTED], called [REDACTED], and I was in the soup aisle,
3 I think, looking -- just getting some groceries
4 before I went home to my mom's house. I lived with
5 her at the time.

6 She saw me sort of blankly staring and came
7 and started talking to me, sort of asking if I was
8 okay. That's -- this is my understanding of the
9 conversation.

10 I don't know the exact words that were
11 exchanged, but it came up that I was stressing
12 about not financially being able to provide for my
13 family, the way that I was, all the stress was on
14 me to take care of them.

15 And -- and I was desperately trying to find
16 a [REDACTED], [REDACTED] when I could on the
17 weekends generally.

18 And I was having a hard time making it to
19 some auditions because I would end up late because
20 I was working in [REDACTED] on the street.

21 Around that time, my mom was [REDACTED]
22 with [REDACTED] and I was putting the money that we
23 made, [REDACTED] I, into a bank account
24 and my mom was spending it. It was a very
25 stressful time for me because of this.

1 [REDACTED]
2 We were -- [REDACTED] I were
3 responsible for taking care of my mom [REDACTED]
4 [REDACTED] and [REDACTED] started to lose
5 it, so all of this pressure was on me and this is
6 what I was telling [REDACTED], that I just -- I was
7 really depressed.

8 I don't know if I told her that generally,
9 but I think she understood that I wasn't okay and
10 she seemed to have this ability to help me.

11 She knew someone who could employ me, who
12 was looking for a massage and I lit up because I --
13 my mom had a bad back and throughout my childhood,
14 I was made to massage her.

15 And I didn't really like it, but I was good
16 at it and I knew I was good at it because my mom's
17 a tough critic and wouldn't lie. Like she -- she
18 would rather say mean stuff than nice stuff.

19 I didn't know that it was like a profession.
20 I didn't know that you needed a license or anything
21 at that time. I just was like someone wants to pay
22 me to do massage and I know how to do it and that
23 could be a way out of like working in the freezing
24 cold and -- and not making very much money.

25 Because it was -- the mayor was cracking

1 [REDACTED]
2 down on vendors and taking their stuff and smashing
3 it and throwing it away. There was a lot of, like,
4 unrest among the artists in [REDACTED] between them and
5 the mayor and the police.

6 And I was forced to deal with all of that as
7 a child, like, on -- being on the street, cops
8 would come up and harass us. So these were things
9 that were really weighing on me and I -- I would
10 have done anything to ameliorate that with a
11 different job.

12 I wouldn't have done what I -- like now what
13 happened to me, I didn't want that to happen.
14 That's not what I was told would happen.

15 Q. Did [REDACTED] tell you that she had
16 been providing massages to Mr. Epstein?

17 A. I don't know if she did, but she knew
18 that he got them.

19 Q. Did she tell you how much you would be
20 paid for providing a massage?

21 A. I believe she -- I believe she told me
22 that he paid -- I think at that time, I don't
23 remember for sure, but I think she did tell me that
24 it was like \$300 for a massage, that that was like
25 what you would get.

1

2 Q. Okay. And after she told you about
3 this opportunity, had you -- did she tell you the
4 name of the individual?

5 A. No.

6 Q. Okay. What -- did she bring you to his
7 house? Did she provide you with a phone number?
8 Sort of how did the connection happen?

9 A. I don't remember exactly, but I think
10 that maybe she had -- maybe she gave my number to
11 Lesley Groff and she called me to set it up I
12 think.

13 I kind of vaguely remember that. I'm not
14 100 percent sure that's how it happened, but I'm --
15 that's my best guess.

16 Q. And so how long after the conversation
17 with [REDACTED] at the grocery store was it before
18 you went to the house to meet Mr. Epstein?

19 A. I don't recall because it was so many
20 years ago, but probably that week.

21 Q. Okay. Did [REDACTED] come with you
22 when you went to the house?

23 A. No.

24 Q. You went by yourself?

25 A. Yes.

1

2 Q. Okay. And you were given an address to
3 go to?

4 A. Yes.

5 Q. Okay. And you think somebody called
6 you to tell you where to go?

7 A. I think so.

8 Q. Okay. Did -- anything else that you
9 remember about that phone call or communication
10 about where to go or how much you'd be paid?

11 A. No. It was so many years ago.

12 Q. Do you know whether [REDACTED] received
13 any compensation for providing your information to
14 Mr. Epstein?

15 A. I don't know if she explicitly told me,
16 but I know that that's how it worked after being
17 friends with her, that that was something she did.
18 That that was -- that was the -- like the network.
19 That's how the network operated of Jeffrey.

20 That girls found girls and were compensated
21 for it. It was -- it was sort of just like that's
22 like how the operation ran. That was -- it was
23 what everyone did.

24 So sort of -- I don't know when I came to
25 that realization, but she must have been

1 [REDACTED]
2 compensated for it.

3 Q. And you said after being friends with
4 her, that that was something she did, so by that
5 was something she did, you mean introducing other
6 women to Epstein?

7 A. Yes, I believe I remember -- I think I
8 remember her introducing other women or like
9 scouting for him, so to speak.

10 Q. At the time that you were first
11 introduced to him, where were you living?

12 A. I was living with [REDACTED].

13 Q. And is that in [REDACTED]?

14 A. No.

15 Q. Okay. Where were you living, where was
16 it?

17 A. [REDACTED].

18 Q. Okay. How did you -- so when you first
19 went to Epstein's house, did you take the subway
20 there? How did you get there?

21 A. It's so -- so many years ago. It
22 depends on where I -- I don't remember where I was
23 coming from.

24 It's possible I walked across [REDACTED],
25 it's possible I took the bus across town from [REDACTED]

1 [REDACTED]
2 if I was [REDACTED]. It's possible I came from [REDACTED]
3 [REDACTED], I would have taken the subway.

4 There are so many areas of [REDACTED]
5 that I could have been coming from. I could have
6 been coming from [REDACTED] at -- working on the street.
7 Any way that I would have come was probably subway
8 or a bus.

9 Q. And when you got there, who did you
10 encounter first at the house?

11 A. Lesley Groff, I believe.

12 Q. And what conversation did you have with
13 Ms. Groff?

14 A. I don't remember the exact words, but I
15 was made to believe that things were confidential,
16 that my stuff was to remain in the front office
17 space before I proceeded into the rest -- into the
18 rest of the home. I couldn't bring my phone or
19 anything or my purse.

20 She was nice to me, like polite, but I --
21 just, like, firm and I don't remember, like,
22 anything else, like, word-wise.

23 Q. Did you interact with or see anybody
24 else at the house other than Ms. Groff on that day?

25 A. Oh. I could have, but I don't

1 [REDACTED]
2 remember. Besides Jeffrey, I don't remember.
3 Maybe like the house staff probably.

4 Q. And then you've already provided
5 information and statements about this initial
6 massage appointment that you had with Mr. Epstein
7 which did not have a sexual component; is that
8 correct?

9 A. Can you rephrase the question?

10 Q. Yes. Did the initial massage that you
11 gave Jeffrey Epstein have a sexual component?

12 A. This has been hard with my
13 recollection. The way I remember is that it
14 happened over a series of visits slowly because
15 he -- I didn't -- had a hard time trusting people,
16 hiding -- you know, like, my -- on education and
17 stuff, so I -- it was done slowly and I believe it
18 was over a series of days.

19 Q. Okay. How much were you paid for the
20 first massage?

21 A. I believe it was 300.

22 Q. And how were you paid that money?

23 A. Cash.

24 Q. By whom?

25 A. By Jeffrey.

1

2 Q. Then did you go back to his house the
3 next day?

4 A. I mean, I came -- I went back to his
5 house, I don't remember what day it was.

6 Q. Was it within a day or two?

7 A. It was probably within a day or two.

8 Q. Okay. And the second time that you
9 went back to the house, how did that -- how was
10 that arranged?

11 A. What do you mean?

12 Q. I mean, how did you -- were you asked
13 to come back? What was the setup?

14 A. In order to answer truthfully, like, it
15 would be hard for me to say, like, how. It was
16 probably a phone call by Lesley.

17 Jeffrey, I don't know if he even said I'll
18 see you tomorrow, like, I don't remember. But
19 that's the only way it could have happened is that
20 his assistant called.

21 Q. Okay. When you came back for a second
22 massage, did you provide a massage to
23 Jeffrey Epstein the second time?

24 A. This is where I have a hard time
25 answering because what do you mean by massage?

1

2 Q. Well, let me ask the question in this
3 way. You've provided statements that indicate that
4 it was the third time that you went to Epstein's
5 house that the massages took a sexual turn?

6 A. Yep.

7 Q. And so I'm trying to understand your
8 best memory --

9 A. Okay.

10 Q. -- of that.

11 A. Because like massage requires a
12 license, so this has been hard when people ask me
13 questions or even when I'm responding, like,
14 massage therapy, you have to have a license for it.
15 So I've never actually given a legal massage.

16 What I thought at the time, my naivete was
17 that it was a profession that I was able to do, but
18 I wasn't -- I wasn't equipped to do that.

19 And in terms -- like there was body
20 touching, I -- I gave him what a massage therapist
21 would -- would give, I would say.

22 And you were asking on the second day what?

23 Q. So let me ask this. What -- if there's
24 a vocabulary that we can use, that sort of we can
25 agree on --

1

2 A. Yeah.

3 Q. -- that might be helpful.

4 So when you went to Jeffrey Epstein's house
5 the second time, you were massaging him. Like, is
6 that language that we could use? I understand what
7 you're saying about the certification.

8 A. I think nonsexual touch or something
9 maybe or like as long as we understand it. Because
10 I feel like in terms of being able to tell the
11 truth, like I can't say I gave him a massage at
12 that time, you know what I mean?

13 Like, it was -- it would have to be -- I
14 could say it was like -- like a massage --

15 Q. Mm-hmm.

16 A. -- but it wasn't like a legal massage.

17 Q. Okay.

18 A. So maybe like nonsexual touch would be
19 a -- as a placeholder. I don't -- I'm not a -- I'm
20 not like the best person to figure that out right
21 now, but --

22 Q. So the second time that you went to
23 Epstein's house -- and well, let me ask the
24 question a different way.

25 What was the first time that your

1 [REDACTED]
2 interactions with Epstein became sexual?

3 A. I can't tell you exactly which day or
4 how many days later it was. It's speculation, but
5 I just know that it wasn't like the first time.

6 Q. It was within a few days --

7 A. Yeah.

8 Q. -- of the first time that you met him?

9 A. Yes.

10 Q. Okay. And after the interactions
11 became more sexual in nature, you -- did you tell
12 anybody about it?

13 A. I talked to one person.

14 Q. Who did you talk to?

15 A. I talked to [REDACTED]

16 Q. And what did -- did you call her? Did
17 you meet her in person? How did that happen?

18 A. I remember it as a call.

19 Q. Okay. Do you remember you calling her?

20 A. Yes.

21 Q. Okay. And what did you say?

22 A. I was freaked out. I was upset and
23 felt like she -- I felt like she knew and I was
24 upset with her for -- for like putting me in an
25 unsafe situation.

1

2 I -- she apologized, she's very good at --
3 she has a very high, innocent, squeaky voice. Like
4 I believed her. I don't know -- she knew.

5 Now that I know in hindsight, but she was,
6 like, I'm so sorry, I never know who -- who he does
7 that with or who he doesn't. Some people he
8 doesn't.

9 And so that was her explanation for not
10 telling me that it could turn into sex or a sexual
11 nature, sexual touch.

12 Q. And what did you say in response to
13 that?

14 A. I think about people's feelings more
15 than my own a lot of the time and I felt really bad
16 that she felt bad. That's how I was trained from
17 my mom.

18 I remember -- I mean, I became friends with
19 her after that, so I guess I -- I felt bad that she
20 was so upset about it and my go to, the way that my
21 brain is wired from my mother, is to care for
22 others who are in distress right away.

23 And she was -- she seemed to be really
24 distraught that she had done this to me and I
25 forgave her and I said it was okay, but it wasn't.

1

2 Q. Did she tell you that she was also
3 engaged in sexual conduct with Epstein?

4 A. I didn't ask her, but I -- I just
5 assumed. There's a lot of assuming, right? Like
6 later I found out that she was, but in that moment,
7 I didn't know.

8 Q. And later did you see her with Epstein
9 at times that you were at the house or elsewhere
10 with him?

11 A. I don't think he ever had crossover
12 with the two of us for some reason.

13 Q. What do you mean by crossover?

14 A. Like I don't remember us being in the
15 same -- at the house at the same time. There might
16 have been at a later date, there were a lot of
17 threesomes that I was forced to participate in
18 against my will.

19 But I don't -- it's possible she and I did.
20 I've blocked a lot from my brain and that I'm not
21 sure of.

22 Q. You stayed in contact with [REDACTED]
23 over the course of time that you were involved with
24 Epstein, correct?

25 A. Yes. I -- when I left my mom's house,

1

2 I stayed with her for a bit of time.

3 Q. Okay. And where did she live?

4 A. She lived across from [REDACTED], I don't
5 know the exact address.

6 Q. So at the time that you were first
7 introduced to Epstein, you were living in [REDACTED]
8 [REDACTED], correct?

9 A. Yes.

10 Q. Where did you live after [REDACTED]?

11 A. My mom would have assumed that like I
12 was still living at her house because I had to do
13 it gently so she wouldn't freak out. I never took
14 all of my stuff out and moved.

15 I had a small bag of belongings like a few
16 outfits and I lived with [REDACTED] and I kind of stayed
17 with -- I stayed with her for a little while and a
18 couple other friends here and there. Yeah,
19 that's --

20 Q. Who are the other friends that you
21 stayed with?

22 A. I don't remember. I just -- [REDACTED]
23 friends, people at [REDACTED].

24 Q. At some point did you move to [REDACTED]?

25 A. Yes.

1

2 Q. When was that?

3 A. I don't remember the exact date.

4 Q. Was it after this time when you were
5 staying with different [REDACTED] friends?

6 A. Yes.

7 Q. Okay. Was [REDACTED] the next place you
8 moved after you were sort of staying around at
9 friends' houses?

10 A. Yes, I think so.

11 Q. And this is on [REDACTED] in [REDACTED]?

12 A. It sounds right.

13 Q. Okay. How long did you live there?

14 A. I don't know.

15 Q. Who did you live with there?

16 A. It was a place that [REDACTED] used to
17 reside in and she moved -- I don't know how -- how
18 it happened, but she had a room set up there with
19 stuff in it that I could use, like a bed and stuff
20 and she let me pay her rent for staying there, so
21 that was what I did.

22 There were two other housemates, a friend of
23 her -- a friend of hers or someone she dated knew
24 these two guys or like rented the property out to
25 them. I don't know the specifics. So there were

1 [REDACTED]
2 two other [REDACTED] guys that lived there in the
3 house.

4 Q. Do you remember their names?

5 A. No, I don't remember their names.

6 Q. And how long did you live at that place
7 in [REDACTED]?

8 A. I couldn't tell you.

9 Q. Like a year, two years?

10 A. Everything -- time felt different back
11 then. I -- I have no -- I can't even guess.

12 Q. Okay. After you left that apartment in
13 [REDACTED], where did you live next?

14 A. I'm not sure the order of where I
15 moved, like which place was next. I may have moved
16 home for a chunk of time because there was a time
17 where I did that, but I don't know the order of --
18 I would have to, like, really see everything laid
19 out to -- I could figure it out, but right now I
20 can't give you a straight answer.

21 Q. At some point, did you move to New
22 Jersey?

23 A. No.

24 Q. Okay. Let's go back to the 2006
25 timeframe that we were talking about when you first

1 [REDACTED]
2 met Epstein. At that point in time, you were
3 living in [REDACTED] in [REDACTED], right?

4 A. Yes.

5 Q. Okay. After the first sexual encounter
6 with Epstein, when was the next time that you went
7 back to Epstein's house?

8 A. I think I already answered this
9 question, I don't -- I don't know.

10 Q. Was it within days?

11 A. It could have been days. It -- it was
12 over a series of days. But the second time I went
13 there, I don't remember the exact day, it could
14 have been the next day, it could have been -- I
15 don't know.

16 Q. When -- after the -- the interaction
17 that turned sexual with Epstein, were you paid
18 differently for that interaction than the previous
19 nonsexual interactions?

20 A. Yes.

21 Q. Okay. How much were you paid for the
22 interaction that turned sexual?

23 A. I can't tell you an exact dollar
24 amount, but I think it was like 800 or something.

25 Q. Okay. And after the interaction with

1 [REDACTED]
2 Epstein turned sexual, the next time you went,
3 whenever that was, in a couple of days -- did you
4 have another sexual interaction with Epstein?

5 A. After that first time, the sexual
6 interaction, every interaction was sexual in nature
7 pretty much.

8 Q. Okay. Did you ever have any nonsexual
9 interactions with Epstein? Nonsexual touching, to
10 use that terminology, after the interactions had
11 turned sexual?

12 A. Yes.

13 Q. Okay. How many times did you have the
14 nonsexual interactions with Epstein?

15 A. I don't know. It depends. Like what
16 kind of -- what kind of interactions are you
17 talking about? Like -- like the non-massage
18 massage or --

19 Q. Let's talk about both, so first the
20 non-massage massages, but without a sexual
21 component.

22 A. Any time that it involved the massage
23 room in the mansion, it was sexual nature at some
24 point during that time.

25 Q. Okay. What about other interactions

1 [REDACTED]
2 that didn't involve the massage room?

3 A. He kept tabs on me, he had me followed.
4 I had to report to his -- I -- we called them
5 reports. The other women, it was standard to be
6 called in, if he was gone for, like, a week or
7 something, he would -- we never knew why we were
8 showing up.

9 Sometimes it would be for a massage and I
10 never knew how many hours. Sometimes I would be
11 waiting all day to see him. I'd be in the office
12 waiting.

13 We would just -- we just knew we had to be
14 there when we were called. I would show up and
15 sometimes it would just be -- when I was in school,
16 how's school? What are you doing?

17 I got in trouble for going on a -- on a trip
18 without asking him. I was -- it was -- I didn't
19 realize that I was basically on call, like, I was
20 not allowed to go anywhere without his permission.

21 So there are, like, times where he would
22 ask -- have me come in to discuss certain things
23 like that.

24 Rules or ask me to -- if I knew anyone to
25 introduce to him, which I did not want to do, so he

1 [REDACTED]
2 would push me on other women, that isn't there any
3 pretty girls at the [REDACTED] or things like
4 that. We would discuss stuff like that during
5 these times.

6 Q. When you went -- interacted with
7 Epstein and there wasn't a sexual component, were
8 you paid to go there?

9 A. I don't believe I was, no.

10 Q. And every time -- well, withdrawn.

11 When you interacted with Epstein in the
12 massage room, which you've testified there was
13 always a sexual component, were you paid every time
14 that you had those types of interactions with
15 Epstein?

16 A. Yes, almost every single time. There
17 were a few times where after he got back from jail
18 he may have forgotten or something, but there was
19 other forms of payment.

20 Like paying for [REDACTED] or it was
21 understood at a certain point when he felt like he
22 hadn't scared me enough, that I didn't -- I
23 couldn't ask for cash.

24 Like I didn't ever asked for anything or
25 said, oh, you forgot to pay me, but there was

1 [REDACTED]
2 always some form of payment involved, be it like
3 over a length of time, like [REDACTED] or -- yeah, yeah
4 stuff like that.

5 Q. And just to make sure my question is
6 precise, when you would go and provide a sexual
7 massage in the massage room, were you always paid
8 cash for those interactions?

9 A. Yes.

10 Q. And how were you paid, again,
11 physically? Was it from Epstein, was it from
12 somebody else?

13 A. It was from Jeffrey, but a lot of times
14 I would be told to go to the office to get the
15 money.

16 Q. And how much were you paid for those
17 sexualized massages?

18 A. That's sort of a broad question.

19 Q. Was it the same amount of money every
20 time?

21 A. No.

22 Q. Okay. You testified earlier that for
23 the first time that it took a sexual component, you
24 were paid \$800, correct?

25 A. Yes.

1

2 Q. Okay. What different amounts were you
3 sometimes paid for the sexualized massages?

4 A. For some reason it fluctuated. The
5 general amount was 300, which was standard for --
6 it was, you know, what he paid most women was the
7 general like amount of money.

8 Sometimes when he was feeling -- I don't
9 know, he would give me more or it was over, but the
10 most -- most of the time it was \$300.

11 Q. Did you ever receive wire transfers
12 from Epstein?

13 A. From my memory, no.

14 Q. You said that sometimes Epstein would
15 pay you cash and sometimes you'd go to the office
16 to get cash, correct?

17 A. Yes.

18 Q. Who in the office would give you the
19 cash?

20 A. There were three individuals that I
21 named earlier. Well, one that I couldn't remember
22 the name of. It would have been one of them.
23 Bella or Darren or -- and I'm forgetting the third
24 name.

25 Q. I think you had said earlier

1

2 Bella Klein and Richard Kahn?

3 A. And then Darren Indyke.

4 Q. And Darren Indyke. Did Lesley Groff
5 ever give you the cash?

6 A. I think she did at certain times
7 when -- it depended on who was -- who was there or
8 where I got the money, but I -- it depended on the
9 time of -- of like where the office was located
10 also.

11 Q. Okay. Did you ever get a check?

12 A. Can you be more specific or --

13 Q. Did you ever receive payment for the
14 sexualized massages by check as opposed to cash?

15 A. I don't know.

16 Q. Do you have any memory of receiving a
17 check from Epstein or Kahn or Klein or Indyke?

18 A. Yes.

19 Q. And what memory do you have of
20 receiving those checks?

21 A. I just know that I -- I received
22 checks.

23 Q. And were those checks for the usually
24 \$300 for the sexualized massage?

25 A. I'm not sure.

1

2 Q. Okay. Do you have any memory of
3 receiving a check from Epstein or any of these
4 other individuals as payment for the sexual
5 massage?

6 A. I believe so. I don't -- I'm not
7 100 percent sure.

8 Q. Okay. Do you have any memory of
9 receiving a wire transfer in the amount of [REDACTED]
10 from Epstein?

11 A. I don't. I don't remember that, but --

12 MS. ELLSWORTH: Do you -- why don't you pull
13 it out? Let's do both of them.

14 MS. WARREN: Mm-hmm.

15 MS. ELLSWORTH: Thank you. I'm going to
16 mark as Exhibit -- are we on 5 -- Exhibit 5, a
17 document that has been produced, but I think it was
18 in Excel, so I don't have a Bates number on it, but
19 I know this has been produced.

20 MR. EDWARDS: It's been produced from JP
21 Morgan --

22 MS. ELLSWORTH: Yeah.

23 MR. EDWARDS: -- to us?

24 MS. ELLSWORTH: Yeah.

25 MR. EDWARDS: And it's originating from JP